

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Janette Marie Griffin
Dottie Griffin, Debtors**

**Case No. 25-00631-JAW
CHAPTER 13**

MOTION TO ADJUST PLAN PAYMENTS

COME NOW, Debtors, by and through counsel, and move this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

1. Debtors commenced this case on March 10, 2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The bar date for filing proof of claims was May 19, 2025, for all creditors and September 28, 2025, for government entities.
3. That all expected government claims have been filed.
4. That Debtor's monthly plan payment should be recalculated to only pay timely filed claims over the full sixty (60) months of the plan.

WHEREFORE, Debtors prays that the Trustee recalculate the plan payment to pay only the timely filed claims over the full sixty (60) months through their bankruptcy plan and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on July 22, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.